

24664



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

June 11, 2002

Ms. Kathleen Hain, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

RE: Field Sampling Plan for the Pre-Remediation Sampling of the Central
Facilities Area-04 Pond (Draft)

Dear Ms. Hain:

The Idaho Department of Environmental Quality (IDEQ) has completed its review of the above-referenced document received on May 21, 2002. IDEQ comments are enclosed.

If you have any questions regarding these comments, please contact Mr. Clyde Cody at 208-373-0556.

Sincerely,

A handwritten signature in black ink, appearing to read "Daryl F. Koch".

Daryl F. Koch
INEEL Remediation Coordinator
Waste Management and Remediation Division

DK:ab C:\My Documents\Daryl K\Correspondence\CFA04FS\Plet.doc

cc: Clyde Cody, IDEQ TS
Carol Hathaway, DOE-ID
Kathy Ivy, EPA Region X
Reading File
Source File

IDEQ Technical Review Comments for the Field sampling Plan for the Pre-Remediation Sampling of the Central Facilities Area-04 Pond (Draft)

June 11 , 2002

Page 1 of 3

General Comments

1. This document appears to contain the first reference to the revised mercury Final Remediation Goal (FRG) of 8.4 mg/kg, on page 2-1. The revised FRG is unaccompanied by any explanation as to the origin. Consider including a brief explanation of the FRG origin in the appropriate section.
2. A discussion should be added concerning how the vertical analytical results from the 14 zones will be graphically displayed so as to be useful during the actual excavation of each zone.
3. There appears to be no discussion of the plans for the excavation of the asbestos contaminated construction debris. It is understood from discussions of the ICDF WAC relative to CFA-04 that there are expectations of disposal of approximately 100 yards of this material.

Specific Comments

1. Section 2-2, page 2-4, last paragraph of section

Indicate that the OU 4-13 RI/FS estimate of the volume of mercury-contaminated soil (6,338 m³) in the pond is based on a previous FRG that has been changed to 8.4 mg/kg.

2. Section 2.3, page 2-4, last paragraph

- a) **Third Sentence:** The 10 percent is a minimum guideline and refers to the containers or truckloads excavated from zones of like contamination. The referenced sentence adds little value to this section, and we recommend it be deleted.
- b) **Last Three Sentences:** The discussion regarding OU3-13 required verification sampling is inaccurate and should be deleted. Pre-excavation sampling cannot be used to reduce the verification and Quality Assurance requirements for the ICDF complex.

3. Table 3-1, page 3-2

For "PSQ #2b, the significance of the 260 mg/kg concentration for total mercury is not understood. Please explain, and consider adding a footnote to the table.

4. **Section 4.3, page 4.3, first sentence**

Figure 4-3 has been subdivided into 14 zones (not 13), as indicated on Figure 4-3, not Figure 4-2.

5. **Section 4.3, page 4-3, last paragraph**

There appear to be no locations on Figure 4-2, either on the figure or included in the legend, indicating areas "with concentrations below the final remediation goal of 8.4 mg/kg total mercury". Please correct this omission.

6. **Section 6.1.2, page 6-1, first sentence**

Change "Figure 4-2" to "Figure 4-3".

7. **Section 6.2.4, Page 6-6**

The description of potential CERCLA waste storage areas or waste storage units is too vague. This document must identify the ARAR for the type of storage unit (e.g. the unit will comply with the substantive aspects of 40 CFR 262.34 (a) (1)). Note that these ARARs must have been identified in the ROD which presented the remedy for CFA-04 in order to establish a CERCLA storage unit at this remediation site. Further, this FSP must include a waste management plan that describes the location and protective features (e.g., secondary containment, if required) of the storage area. The types of wastes that will be stored should be identified, as well as specific packaging and/or inspection requirements for those wastes.

8. **Section 6.2.7, page 6-7**

- a) **General Comments:** It is unclear why this section does not describe the process for disposing of waste in the ICDF, which should be the preferred disposal site for contaminated CERCLA wastes. The test should describe, or at least reference, the information in Section 3.1 of Appendix J of the finalized SSSTF Remedial Design/Construction Work Plan. In particular, Figure 3-1 of Appendix J describes the waste flow process and requirements for moving wastes from the generating site to the ICDF complex. The ICDF complex will have separate quality assurance and verification requirements, but those are not the responsibility of the generating site.

IDEQ Technical Review Comments for the Field sampling Plan for the Pre-Remediation Sampling of the Central Facilities Area-04 Pond (Draft)

June 11 , 2002

Page 3 of 3

- b) First Paragraph:** The term "Industrial Waste" must be defined in this document. Note that a suitability determination will be required for any CERCLA wastes that are disposed in the CFA landfills.

- c) Second and Third Paragraphs:** CERCLA wastes that are determined to be contaminated above risk-based concentrations with hazardous or radiological contaminants should be sent to the ICDF as a first disposal choice. The ICDF complex includes a RCRA-compliant storage area for CERCLA wastes awaiting disposal in the ICDF landfill. It is unclear why this section refers to terms of existing "Master Task Agreements," the "SMO/WGS," and the "RRWAC." See part (a) of this comment.